

Exhibit L

From: Brian Robison <brian@brownfoxlaw.com>
Sent: Thursday, September 1, 2022 11:35 AM
To: Wheeler, Travis; Lynch, Dennis J.
Cc: Eddy, David C.; Richardson, Joyce; Surratt, Gina Y.; Fyfe, Dennie M.; Butler, Matt; Stone, Rod
Subject: RE: Meet and Confer re Pork Product Data Productions

{EXTERNAL EMAIL}

Travis – we have checked with our client, and it is still not willing to go beyond the massive data production it made in reliance on agreements reached with the class plaintiffs and the DAPs who negotiated those agreements. It looks like we cannot work this one out. Please let us know about a hearing date if you decide to pursue this.

Brian



BRIAN E. ROBISON
972.707.1809
BROWNFOXLA.W.COM

From: Wheeler, Travis <TWheeler@nexsenpruet.com>
Sent: Friday, August 19, 2022 2:40 PM
To: Brian Robison <brian@brownfoxlaw.com>; Lynch, Dennis J. <DLynch@nexsenpruet.com>
Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>; Butler, Matt <MButler@gibsondunn.com>; Stone, Rod <RStone@gibsondunn.com>
Subject: RE: Meet and Confer re Pork Product Data Productions

Brian:

Thank you for providing Smithfield's summary sales data sample in furtherance of our meet and confer process. As agreed, we and our economic consultants have analyzed these data and concluded that they are of no value to DAPs for estimating the potential overcharges on the pork products they purchased. At a minimum, we need data containing the necessary variables reflecting prices, weights, and product description, on at least a monthly basis.

As others were able to produce such data for the excluded products with no undue burden, we assume Smithfield can similarly apply filters to its overall sales database for the excluded products at issue.

We ask therefore that Smithfield supplement its data to address these issues.

Best,
Travis

Travis C. Wheeler
Member
Nexsen Pruet, LLC
1230 Main Street, Suite 700
Columbia, SC 29201
PO Drawer 2426 (29202)
T: 803.540.2117, F: 803.727.1432
TWheeler@nexsenpruet.com

www.nexsenpruet.com

NEXSEN | PRUET

From: Brian Robison <brian@brownfoxlaw.com>
Sent: Monday, August 15, 2022 10:56 AM
To: Lynch, Dennis J. <DLynch@nexsenpruet.com>; Wheeler, Travis <TWheeler@nexsenpruet.com>
Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>; Butler, Matt <MButler@gibsondunn.com>; Stone, Rod <RStone@gibsondunn.com>
Subject: RE: Meet and Confer re Pork Product Data Productions

{EXTERNAL EMAIL}

Dennis (and Travis) – In an attempt to reach a compromise that would avoid motion practice, I have attached a sample showing you the 2016-17 data that we produced for purposes of settlement administration for the DAPs you listed below. After you review this sample, please let us know if this sort of data would suffice for your purposes. If so, then we can work with our vendor to pull the data for the other years.

Brian

 **BRIAN E. ROBISON**
 972.707.1809
BROWNFOXLAWS.COM

From: Lynch, Dennis J. <DLynch@nexsenpruet.com>
Sent: Thursday, August 11, 2022 4:52 PM
To: Brian Robison <brian@brownfoxlaw.com>; Wheeler, Travis <TWheeler@nexsenpruet.com>
Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>; Butler, Matt <MButler@gibsondunn.com>; Stone, Rod <RStone@gibsondunn.com>
Subject: RE: Meet and Confer re Pork Product Data Productions

Brian –

Thanks for your email. Travis is out of pocket today, so I'm stepping in to respond. For purposes of resolving this matter, we are willing to review summary level data for DAPs similar to what Smithfield provided the class claims administrator, provided that Smithfield also provide the same data for categories 1 (franks) and 2 (multi-ingredient products) for the remaining Nexsen Pruet clients and

clients of Cadwalader, Carlton Fields, and Kaplan Fox. There should be no appreciable burden as these data have already been collected and produced. If Smithfield produces these data this week (by COB tomorrow), we will promptly review the data and respond by COB next Tuesday August 16. If DAPs determine in good faith they need more granular transaction data.

Best,
Dennis

Dennis J. Lynch

Member

Nexsen Pruet, LLC

1230 Main Street, Suite 700

Columbia, SC 29201

PO Drawer 2426 (29202)

T: 803.540.2056, F: 803.727.1463

DLynch@nexsenpruet.com

www.nexsenpruet.com

NEXSEN | PRUET

From: Brian Robison <brian@brownfoxlaw.com>

Sent: Wednesday, August 10, 2022 7:34 PM

To: Wheeler, Travis <TWheeler@nexsenpruet.com>

Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Lynch, Dennis J. <DLynch@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>;

Butler, Matt <MButler@gibsondunn.com>; Stone, Rod <RStone@gibsondunn.com>

Subject: RE: Meet and Confer re Pork Product Data Productions

{EXTERNAL EMAIL}

Travis:

I write to follow-up on our call Monday about certain DAPs' new data requests. As you know, Smithfield objects to the request for additional data on numerous grounds. There is no need to rehash that here. However, in an attempt to reach a compromise and avoid motion practice, Smithfield is willing to produce to Purina and two Boies clients the same type of non-invoice level data that Smithfield previously provided to DPP counsel for claims-administrative purposes. Please let me know if this is acceptable.

Brian



BRIAN E. ROBISON

 972.707.1809

BROWNFOXLAWS.COM

From: Wheeler, Travis <TWheeler@nexsenpruet.com>

Sent: Friday, August 5, 2022 11:35 AM

To: Brian Robison <brian@brownfoxlaw.com>

Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Lynch, Dennis J. <DLynch@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>; Butler, Matt <MButler@gibsondunn.com>; Stone, Rod <RStone@gibsondunn.com>

Subject: RE: Meet and Confer re Pork Product Data Productions

Thanks Brian. Let's do 10:00C/11:00E. We can use the following:

Dial in: 844.498.9491

Conf ID: 2117

Passcode: 123456

Travis C. Wheeler

Member

Nexsen Pruet, LLC

1230 Main Street, Suite 700

Columbia, SC 29201

PO Drawer 2426 (29202)

T: 803.540.2117, F: 803.727.1432

TWheeler@nexsenpruet.com

www.nexsenpruet.com

NEXSEN | PRUET

From: Brian Robison <brian@brownfoxlaw.com>

Sent: Thursday, August 4, 2022 3:36 PM

To: Wheeler, Travis <TWheeler@nexsenpruet.com>

Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Lynch, Dennis J. <DLynch@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>; Butler, Matt <MButler@gibsondunn.com>; Stone, Rod <RStone@gibsondunn.com>

Subject: RE: Meet and Confer re Pork Product Data Productions

{EXTERNAL EMAIL}

Travis:

I am surprised to hear from you after so much time had passed. I thought this had become a non-issue.

I have attached my June 13 email to Elizabeth. As I said there, Smithfield did not send to the claims administrator the granular level of detail that a few DAPs are now requesting, nearly a year after substantial completion of data productions. So, you are wrong to say below that Smithfield "supplied such data to the claims administrator." I would assume that the few DAPs that suddenly are demanding still more data productions have their own transaction data showing which products they purchased, in what volumes,

at what prices, and from which suppliers. That should suffice. However, I am glad to talk by phone to see which DAPs think they need more data and on which additional pork products and to see if there is a way to avoid an impasse. I am on the road all day tomorrow, but I could talk Monday morning anytime from 8-12 central.

Best regards,
Brian



BRIAN E. ROBISON
972.707.1809
BROWNFOXLAWS.COM

From: Wheeler, Travis <TWheeler@nexsenpruet.com>

Sent: Tuesday, August 2, 2022 11:51 AM

To: Brian Robison <brian@brownfoxlaw.com>

Cc: Eddy, David C. <DEddy@nexsenpruet.com>; Lynch, Dennis J. <DLynch@nexsenpruet.com>; Richardson, Joyce <JRichardson@nexsenpruet.com>; Surratt, Gina Y. <GSurratt@nexsenpruet.com>; Fyfe, Dennie M. <DFyfe@nexsenpruet.com>

Subject: Meet and Confer re Pork Product Data Productions

Brian: We are writing in regards to your June 13, 2022 response to Elizabeth Moore on our May 31 letter to you seeking complete sales data to DAPs. We disagree that "late arriving plaintiffs" are not entitled to seek discovery in support of their claims, including your client's sales data relevant to their claims, because they filed "too late" for Smithfield's tastes. We are also unclear why Smithfield regards these minor requests as too much of a burden given that it—and the other defendants—supplied such data to the class claims administrator. Finally, given that Smithfield has already produced sales data on more than 24,000 distinct products, we do not see how collecting data for four (4) additional product categories is overly burdensome, especially when, for a Plaintiff like Nestlé Purina PetCare Company, Smithfield is refusing to produce **any** sales data. Please let us know of your availability for a meet and confer call today or tomorrow (Wednesday) to discuss or let us know if we have reached an impasse on the matter.

Regards,
Travis

Travis C. Wheeler
Member
Nexsen Pruet, LLC
1230 Main Street, Suite 700
Columbia, SC 29201
PO Drawer 2426 (29202)
T: 803.540.2117, F: 803.727.1432
TWheeler@nexsenpruet.com

www.nexsenpruet.com

NEXSEN | PRUET

*** FIRM CONFIDENTIAL COMMUNICATION *** This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Nexsen Pruet, LLC may collect personal information

including your name, business name and other contact details, and IP address. If you have any questions, please contact Privacy@nexsenpruet.com.